

STIPULATION AND ORDER SETTING
DEADLINE FOR CERTAIN DEFENDANTS TO
ANSWER PLAINTIFF'S AMENDED COMPLAINT - 1
CASE NO.: 2:21-cv-01670-RSM

COME NOW, Plaintiffs, National Union Fire Insurance Company of Pittsburgh, Pa, Royal & Sun Alliance Insurance Company of Canada, State National Insurance Company, Liberty Mutual Insurance Company, Ace American Insurance Company, Sovereign General Insurance Company, Arch Insurance (UK) Limited, and Certain Underwriters at Lloyd's of London Subscribing to Policy No.'s ENSAM1900387, ENSAM1900206, ENSAM1900393, and ENSAM1900398, *as subrogees of Petrogas Energy Corp. and its related entities* (collectively referred to as "Insurers") and Petrogas Energy Corp. ("Petrogas") (Insurers and Petrogas are collectively referred to as "Plaintiffs"), and Defendants, M/T LEVANT, *in rem*, Avance Levant, LTD c/o Avance Gas LTD, and Exmar Ship Management NV (collectively, "Defendants"), by and through their undersigned counsel and hereby stipulate and agree to a deadline of **April 12, 2022** for Defendants to Answer Plaintiffs' First Amended Complaint [ECF Doc. No. 3].

Plaintiffs sent a request to Defendants to waive service on December 17, 2021. Defendants are foreign entities. Rule 4 states that a defendant located outside of any judicial district of the United States has 90 days to serve an answer after a request to waive service is made. The parties are stipulating to extend the answer deadline provided in Rule 4 to give Defendants additional time to work with local counsel to prepare and file an answer.

Submitted this 4th day of February, 2022.

DENENBERG TUFFLEY, PLLC

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/s/ David R. Denton

/s/ Adil Siddiki

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Attorneys for Plaintiffs

Attorneys for Plaintiffs

NICOLL BLACK & FEIG, PLLC

/s/ Christopher W. Nicoll

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Attorneys for Defendants M/T LEVANT, in rem, Avance Levant, LTD c/o Avance Gas LTD, and Exmar Ship Management NV

1 SO ORDERED,

2 DATED this 10th day of February, 2022.

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5 RICARDO S. MARTINEZ
6 CHIEF UNITED STATES DISTRICT JUDGE
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8 Presented by:

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